

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

IN RE: Gloria Young Taylor Case No.: 13-35574
Debtor(s) Chapter 13

JPMorgan Chase Bank, N.A.

Movant,

v.

Gloria Taylor Young, Debtor
Carl M. Bates, CH13 Trustee

Respondents

RESPONSE TO CREDITOR'S MOTION FOR RELIEF FROM AUTOMATIC STAY

COMES NOW Gloria Young Taylor, Debtor by counsel and provides the following response to the Motion for Relief from Automatic Stay filed in this Court on 1/24/2014:

1. The Debtor admits that the statements in paragraphs 1 and 5 of Creditor's Motion are true.
2. The Debtor neither denies nor admits the statements or allegations in paragraphs 2 and 4 of the Creditor's Motion.
3. The Debtor denies the allegations in paragraphs 3, 6, and 7 of the Creditor's Motion.
4. Upon information and belief, all contractual payments have been made by Debtor's daughter, co-Debtor on this account.

WHEREFORE, the Debtor prays this Court denies the Motion for Relief from Automatic Stay filed by JPMorgan Chase Bank, N.A. in this Court, deny Movant's request to seek relief under state law, and grant Debtor such other relief as is necessary and just.

Respectfully submitted,

Gloria Young Taylor
BY: /s/ Roger C. Hurwitz
Roger C. Hurwitz
Counsel for Debtor
The Debt Law Group, PLLC
4036 Plank Rd
Fredericksburg, VA 22407
(540) 412-1463

Certificate of Service

I hereby certify that I have on February 3, 2014 delivered electronically or by first class mail or hand delivered a true copy of the foregoing Response to Creditor's Motion for Relief to Matthew D. Huebschman, Esquire, counsel for JPMorgan Chase Bank, N.A.

/s/ Roger C. Hurwitz
Roger C. Hurwitz